

Aaron Hansome

1st Texas Health & Life LLC

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Email Address: AaronMHansome@gmail.com

Date: January 7, 2025

To:

Honorable Judge Reed C. O'Connor

United States District Court

Northern District of Texas

501 West 10th St., Rm. 310

Fort Worth, TX 76102

Re: Case No. 4:24-cv-01022

Plaintiff: Mrs. Kelly Bland

Defendant: Aaron Hansome

Dear Honorable Judge O'Connor,

Subject: Submission of USB Containing Audio Exhibits & Additional Details to Existing Exhibits

I am submitting Exhibits B and C in the form of a USB, as these are audio recordings that cannot be submitted through the court's electronic filing system. These exhibits supplement the previously filed transcriptions of the calls in exhibits list (A-6 & A-7) and will provide the actual call recordings.

The exhibits on the USB include:

Exhibit B: Audio recording of inbound call initiated by Mrs. Kelly Bland (formerly Mrs. Kelly Pinn) after missing our 1 outbound call, but seeing the number on caller ID on April 10, 2024, at 11:51 AM CST.

Exhibit C: Audio recording of inbound call Mrs. Bland claimed to be transferred to us by an unknown vendor on April 16, 2024, at 3:47 PM CST.

These recordings are significant as they demonstrate Mrs. Bland's proactive engagement with my office regarding insurance inquiries and reflect the chronology of events outlined in previously submitted evidence.

Additionally, I have amended the exhibits list to include Exhibits B and C for clarity, as well as more details for previously submitted exhibits to ensure consistency, accuracy, and clarity in presenting evidence to the Court.

The USB containing these exhibits will be promptly mailed to the court.

Thank you for your time and consideration.

Respectfully submitted,

Aaron Hansome

Aaron Hansome

Pro Se Defendant



Certificate of Service

I hereby certify that on January 7, 2025, a true and corrected copy of the amended exhibits list, along with Exhibits B and C (emailed audio files containing audio recordings), was served on the Plaintiff by the following method:

Via Email:

Mrs. Kelly Bland

[REDACTED]@gmail.com

Respectfully,

Aaron Hansome

Aaron Hansome

Pro Se Defendant



Chronology of Events with Mrs. Kelly Bland (formerly Mrs. Kelly Pinn)			
Exhibit No.	Date	Medium	Description
A-1	9-Apr-24	WhatsApp Chat	WhatsApp conversation, Amjad gives Aaron a non-compliant list.
A-2	10-Apr-24	WhatsApp Chat	WhatsApp conversation, Aaron tells Amjad it's 37% DNCs. It's very serious and he's already terminated a few vendors for this.
A-3	10-Apr-24	Aaron's Email	Aaron emails Robert at Data Zapp to find out why there are DNCs after paying for the list to be scrubbed.
A-4	10-Apr-24	Robert's Email	Robert at Data Zapp emails back explaining that their system only flags the numbers, but does not remove them.
A-5	10-Apr-24	Scrubbed List	The first page of the scrubbed list from DataZapp showing DNCs including Mrs. Pinn's number, a gentleman that told Aaron he was on the DNC & Wes Newman's.
A-6	10-Apr-24	Mrs. Pinn's Call Back Transcript	Mrs. Pinn saw the 1st Texas missed call on her caller ID and called back. Exhibit A7 is the call transcription. Aaron misidentified where the call was coming from and answered "Legal Touch" thinking it was his doc prep start up company.
A-7	16-Apr-24	Mrs. Pinn's Inbound Transcript	Our office receives another inbound call from Mrs. Pinn's number, and she speaks with one of my contractors, and again doesn't tell us that we have a rogue vendor so we can take action.
A-8	18-Apr-24	Mrs. Pinn's Email	Mrs. Pinn's emails 1st Texas, stating that <u>she was transferred to Aaron</u> which contradicts the recording and transcription of the call where <u>she states that she saw the missed call and called back</u>.
A-9	21-Apr-24	WhatsApp Chat	WhatsApp Chat, Forwarded Wes Newman's Email to Amjad/P-Tech , <u>and Aaron reiterated that he wouldn't buy anymore calls from P-Tech.</u>
A-10	23-Apr-24	Aaron's Email	Aaron emails Mrs. Pinn explaining what happened, and the P-Tech was the guilty party. He also explains that his finances have been consistently bad and he doesn't want to offend her with a low offer.

A-11	23-Apr-24	Mrs. Pinn's Email	<p>Mrs. Pinn explains in email that Aaron can be held personally liable offers to settle for \$3000 with a deadline of the following day and gives Aaron the options of Wire, Zelle, or Venmo.</p>
A-12	26-Apr-24	Mrs. Pinn's Email	<p>When Aaron doesn't respond to the \$3000 offer by the deadline, <u>Mrs. Pinn calls his office and tells one of his contractors to have Aaron call her immediately then sends a follow-up email asking Aaron to either call the same number she requested no more calls on, or email. Mrs. Pinn's explains that her emails are tracked, and that his silence dictates her next move.</u></p>
A-13	Approx. 4/26/2024	RingCentral Screenshot	<p>Screenshot of 1st Texas' internal RingCentral call blocking showing Mrs. Pinn's number and several others from Mrs. Pinn's Area Code.</p>
A-14	29-Apr-24	Aaron's Email	<p>Aaron emails Wes Newman explaining that P-Tech was in a compliance agreement and Aaron gives Wes Amjad's contact information as the CEO for P-Tech and offers to provide more assistance to Wes if it's needed.</p>
A-15	4/10-4/26/24	RingCentral Download	<p>RingCentral Call Log Search of Mrs. Pinn's number showing inbound call dates, and the duration of each call. Notes added for clarity.</p>
A-16	1-May-24	Mrs. Pinn's Email	<p>Mrs. Pinn gives Aaron another opportunity to settle for presumably the prior offer of \$3000, which was more than the office could afford at the time. Mrs. Pinn shares that she will be discussing Aaron's case with her attorney as they pursue her latest TCPA class action law suit. Mrs. Pinn invites Aaron to "google or search me in Pacer to confirm my sincerity to follow through with my rights under the law." Aaron did that, and found 31 TCPA lawsuits filed by Mrs. Pinn in approximately the last 3 years.</p>

A-17	2-May-24	Aaron's Email	<p>Aaron writes Mrs. Pinn an email <u>offering \$300 as an installment</u> from an overage that week on our invoice, and <u>gives her P-Tech's information</u> for the opportunity to pursue the guilty party, also addressing a vendor reaching out to her, which was likely the result of our vendor's being questioned about her claims. The vendor that contacted Mrs. Pinn remains a mystery to this day, and no vendor ever tried to get paid for transferring her to 1st Texas which seems odd considering the call on the 16th of April lasted over 5 minutes.</p>
A-18	20-Sep-24	Mrs. Bland's Email	<p>On Friday September 20th, 1st Texas was emailed by an individual named Kelly Bland, with an email address of kellybland516@gmail.com requesting our internal DNC policy with no other context.</p>
A-19	26-Sep-24	Aaron's Email	<p>The following week we sent the DNC policy and didn't hear anything back for a few weeks.</p>
A-20	16-Oct-24	Mrs. Bland's Email	<p>On the 16th of October, 6 months after 1st Texas trusted an irresponsible lead vendor, who supplied us with a list of non-compliant leads that we called on for less than 4 hours the former Mrs. Pinn, now Mrs. Bland demands 12,000 without any identification of who she was. I get a lot of emails and some percentage of them are just scams, and bad actors trying to take advantage of others. I didn't notice the drafts that were attached because I assumed it was someone phishing or with bad intentions.</p>
A-21	8-Nov-24	BiZFilings Email	<p>On Friday November the 8th, I received an email from BizFilings, the attorneys that helped me organize 1st Texas, notifying me that I was being sued for \$54,000. When I looked at the law suit Mrs. Bland's phone number was redacted, as it was been in everyone of her 31 TCPA lawsuits in the last 3 years or a little over. It took some investigation to even realize this was the former Kelly Pinn. I was able to cross reference the</p>

			<p>phone number Mrs. Bland claims is mine or someone working for me, but 1st Texas never had a markeing department, and only bought leads from vendors we believed were compliant, and if I found out they weren't, I terminated them.</p>
A-22	1-Jan-25	Declaration Under Penalty of Perjury	<p>Declaration by Amjad (P-Tech CEO), acknowledging non-compliance.</p>

Audio Recordings of Mrs. Bland's (formerly Mrs. Pinn's) Inbound Calls To Our Office			
Exhibit No.	Date	Medium	Description
Exhibit B	10-Apr-24	USB: To Be Mailed	<p>Title: Audio recording of inbound call initiated by Mrs. Kelly Bland (formerly Pinn) on April 10, 2024, at 11:51 AM CST.</p> <p>Description: Mrs. Bland returned a missed call from the office, expressing interest in insurance. Audio file provided on USB.</p>
Exhibit C	16-Apr-24	USB: To Be Mailed	<p>Title: Audio recording of inbound call initiated by Mrs. Kelly Bland (formerly Pinn) on April 16, 2024, at 3:47 PM CST.</p> <p>Description: Mrs. Bland inquired about insurance options during the call. Audio file provided on USB.</p>

Compliance Contracts			
Exhibit No.	Date	Location	Description
D-1	7-Nov-24	USA	Echo Media LLC
D-2	11/5/2024	India	RaniSavita Info Hub
D-3	19-Apr-24	USA	Ryan Johnson (Adams Network/Ring Incentive)- Terminated For Non-Compliance
D-4	25-Apr-24	USA	Mark DuBois (Cannaball Ads)
D-5	7-Nov-24	Pakistan	Salman Abbasi (AS Communication BPO)
D-6	8-Jul-24	USA	Elina Vaseli (Phoenix BPO)
D-7	1-Jul-24	USA	Nathan Eddy (Rocktown Media)
D-8	6-Mar-24	Pakistan	Amjad Adil (P-Tech) - Terminated For Non-Compliance

D-9	10-Nov-23	USA	Erik Wolf (Wolfpack Media Group)
D-10	9-Nov-23	Pakistan	Talkline BPO - Terminated For Non-Compliance
D-11	9-Nov-23	Pakistan	Wasi Communications - Terminated For Non-Compliance
D-12	19-Feb-24	India	Zocyimpex
D-13	24-Sep-23	Florida	Remote Agent Sydney Honeycutt's Contractor and Compliance Agreement

Chronology of Events with Mrs. Starling			
Exhibit No.	Date	Medium	Description
E-1	13-Dec-23	Mrs. Starling's Signed consent w/audit trail	Emailed Consent Form To Mrs. Starling allowing my Agency to work on her behalf to get her insurance. She signed it (with audit trail).
E-2	18-Dec-23	Emails From Mrs. Starling	Communication from Mrs. Starling indicating an increase in settlement demands.
E-3	12/13- 12/28/23	WhatsApp chat	WhatsApp chats with Wajid (Talkline BPO) & termination.
E-4	12/14- 12/18/23	WhatsApp chat	WhatsApp chats with Sami (Wasi Communications) &termination.
E-5	11/09/2023 & 11/11/2023	Signed Contracts	Signed Compliance agreements with the <u>most probable</u> offending vendors.

Business, Personal, & Community Character Reference Letters			
Exhibit No.	Date	Medium	Description
Exhibit H-1	3-Jan-25	Signed Letter	Cover Letter for Character References by Aaron Hansome
Exhibit H-2	1-Jan-25	Signed Letter	Albert Latorre – Friend & Business Associate
Exhibit H-3	1-Jan-25	Signed Letter	Kent Kuszajewski – Businessman & Community Associate
Exhibit H-4	1-Jan-25	Signed Letter	Lucitania Nieto – Former Business Associate
Exhibit H-5	1-Jan-25	Signed Letter	Mubashir Naveed Anwar – Virtual Administrative Associate
Exhibit H-6	1-Jan-25	Signed Letter	Ramish Mahmood – Former Insurnace Virtual Administrative Assistant
Exhibit H-7	31-Dec-24	Signed Letter	Patricia Robles Smothers – Community Member, Former Business Assoc.

Exhibit H-8	1-Jan-25	Signed Letter	Samantha Johnson – Community Member & Former Business Assoc.
Exhibit H-9	31-Dec-24	Signed Letter	Thomas Chant – Personal Mentor
Exhibit H-10	2-Jan-25	Signed Letter	Jim Harless – Personal Associate
Exhibit H-11	1-Jan-25	Signed Letter	Jeffrey Smothers – Friend & Community Member
Exhibit H-12	31-Dec-24	Signed Letter	Edgar Burgos Arce – Personal Associate & Community Member
Exhibit H-13	31-Dec-24	Signed Letter	Winfield Wallace Tobey – Community Member
Exhibit H-14	31-Dec-24	Signed Letter	Martin Gee – Friend & Community Member
Exhibit H-15	30-Dec-24	Signed Letter	Kathy Gutierrez – Friend & Community Member
Exhibit H-16	31-Dec-24	Signed Letter	Margaret S. Murtagh – Friend & Community Member
Exhibit H-17	31-Dec-24	Signed Letter	Rodney Erickson – Friend & Community Member
Exhibit H-18	7-Jan-25	Signed Letter	Robert Leighton Richards – Business, Personal, and Community

Comprehensive Summary of TCPA Litigation Strategies			
Exhibit No.	Date	Medium	Description
I-1	Various		Summary of Litigation Patterns
I-2	Various		Visual Summary of TCPA Cases
I-3	Various		Simplified Summary of TCPA Cases Involving Kelly Pinn-Bland
I-4	Various		Comprehensive Summary of All Found Cases Filed
I-5	20-Mar-24	US Court	Affidavit of Dennis Nenninger
I-6	20-Mar-24	US Court	File: Exhibit A - 3-20 Starling_v_OnProcess_Technology
I-7	20-Mar-24	US Court	File: Exhibit B - 3-20-24 Starling_v_OnProcess_Technology
I-8	30-Dec-24	US Court	MotionHearingTranscript- Starling_v_OnProcess_Technology
I-9	22-Nov-24	US Court	File: Vol Dismiss - Starling_v_ATT_Services_Inc

Exhibits J - Continued Compliance After Business Cessation			
Exhibit No.	Date	Medium	Description
J-1	19-Nov-24	Email Correspondence	Response to Jonathan Avery regarding Adam's Network non-compliance, vendor details, and assistance.

J2	16-Dec-24	Email Correspondence	Response to Mariah Caballero offering to assist in holding Adam's Network accountable.
J3	26-Nov-24	Email Correspondence	WhatsApp communication with Adam's Network detailing compliance failures and final notice.

Financial Hardship			
K-1	Present	Letter	Terminal Mother's Hardship Letter
K-2	Present	Letter	Aaron's Financial Hardship Letter
K-3	Present	Letter	Adriana's (Spouse & Son's Mother) Hardship Letter
K-4	Present	Statement	Sworn Statement of Financial Hardship
K-5	Present	Financial Statements	Financial Statements and Budget Overview